

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

[REDACTED]
[REDACTED]
(5) MIGUEL MARTINEZ TORRES
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Defendants.

5:24-CR-00363-FB

D/SC 3:25-cr-530

First Superseding Indictment

COUNT 1: 21 U.S.C. §§ 846, 841(a)(1), & (b)(1)(A)

Conspiracy to Possess with Intent to Distribute Cocaine

COUNT 2: 18 U.S.C. §§ 1956(h) & 1956(a)(2)(A)

Conspiracy to Commit Money Laundering

COUNT 3: 18 U.S.C. §§ 1956(h) & 1956(a)(1)(B)(i)

Conspiracy to Commit Money Laundering

COUNTS 4-6: 21 U.S.C. §§ 841(a)(1) & (b)(1)(B)/(C) & 18 U.S.C. § 2

Possession with Intent to Distribute Cocaine; Aiding and Abetting

COUNT 7: 31 U.S.C. § 5332

Bulk Cash Smuggling

COUNT 8: 21 U.S.C. §§ 841(a)(1) & (b)(1)(C) & 18 U.S.C. § 2

Possession with Intent to Distribute Cocaine

THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Possess with Intent to Distribute Cocaine
[21 U.S.C. §§ 846, 841(a)(1), & (b)(1)(A)]**

That from on or about December 2022 and continuing through the date of this indictment, in the Western District of Texas, Defendants,

[REDACTED],
[REDACTED]
(5) MIGUEL MARTINEZ TORRES,
[REDACTED]
[REDACTED]
[REDACTED]

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offense against the United States: possession with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), & 841(b)(1)(A).

COUNT TWO
Conspiracy to Commit Money Laundering
[18 U.S.C. §§ 1956(h) & 1956(a)(2)(A)]

That from on or about December 2022 continuing through the date of this indictment, in the Western District of Texas, Defendants,

[REDACTED]
[REDACTED]
[REDACTED]

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others, to commit the following offense against the United States in violation of Title 18, United States Code, Section 1956, that is, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, possession with intent to distribute cocaine, in violation of Title

18, United States Code, Section 1956(a)(2)(A), all in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE
Conspiracy to Commit Money Laundering
[18 U.S.C. §§ 1956(h) & 1956(a)(1)(B)(i)]

That from on or about June 2023 continuing through the date of this indictment, in the Western District of Texas, Defendant,

[REDACTED]

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others to commit the following offense against the United States in violation of Title 18, United States Code, Section 1956, that is, to conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving the proceeds of a specified unlawful activity, that is, possession with intent to distribute cocaine, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

COUNT FOUR
Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C) & 18 U.S.C. § 2]

That on or about April 11, 2024, in the Western District of Texas, Defendant,

[REDACTED],

aided and abetted by others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE**Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C) & 18 U.S.C. § 2]**

That on or about April 18, 2024, in the Western District of Texas, Defendant,

[REDACTED]

aided and abetted by others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX**Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B) & 18 U.S.C. § 2]**

That on or about July 9, 2024, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, and others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN**Bulk Cash Smuggling
[31 U.S.C. § 5332]**

That on or about July 30, 2024, in the Western District of Texas, Defendant,

[REDACTED]

with the intent to evade filing a report as prescribed by the Secretary of Treasury, as required by Title 31, United States Code, Section 5316, did knowingly concealed more than \$10,000 in

currency on his person and in any conveyance, and did transport and attempt to transport such currency from a place within the United States to a place outside of the United States, in violation of Title 31, United States Code, Section 5332.

COUNT EIGHT
Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C) & 18 U.S.C. § 2]

That on or about November 1, 2024, in the Western District of Texas, Defendant,

[REDACTED]

aided and abetted by others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C), and Title 18, United States Code, Section 2.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See FED. R. CRIM. P. 32.2]

I.

Drug Violations and Forfeiture Statutes
[Title 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)/(B)/(C), subject to forfeiture pursuant to Title 21 U.S.C. § 853(a)(1) and (2)]

As a result of the foregoing criminal violations set forth in Counts One, Four, Five, Six, and Eight, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. Rule 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which state:

Title 21 U.S.C. § 853. Criminal forfeitures

(a) Property subject to criminal forfeitures.

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; ...

II.

Money Laundering Violations and Forfeiture Statutes

[Title 18 U.S.C. § 1956(a)(1)(B)(i), (a)(2)(A), and (h), subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1)]

As a result of the foregoing criminal violations set forth in Counts Two and Three, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 982(a)(1), which states:

Title 18 U.S.C. § 982. Criminal forfeiture

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956 . . . of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

III.

Bulk Cash Smuggling Violation and Forfeiture Statute

[Title 31 U.S.C. § 5332, subject to forfeiture pursuant to Title 31 U.S.C. § 5332(b)(2).]

As a result of the foregoing criminal violation set forth in Count Seven, the United States of America gives notice to Defendant [REDACTED] of its intent to seek the forfeiture of the property described below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 31 U.S.C. § 5332(b)(2), which state:

Title 31 U.S.C. § 5332.

* * *

(b) Penalty.—

(2) Forfeiture.—In addition, the court, in imposing sentence under paragraph (1), shall order that the defendant forfeit to the United States, any property, real or personal, involved in the offense, and any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the following property described below:

IV.
Real Property

- Real Property located and situated at **8458 Favero Cove, Converse, Bexar County, Texas**, with all buildings, appurtenances, and improvements thereon and any and all surface and sub-surface rights, title, and interests, if any, and being more fully described as follows:

Lot 32, Block 103, Escondido North Subdivision, Unit 2, a subdivision in Bexar County Texas, according to the Map or Plat recorded in Volume 9576, Pages 79-81, Deed and Plat Records of Bexar County, Texas.

- Real Property located and situated at **192 Hidden Ranch Ct., Floresville, Wilston County, Texas**, with all buildings, appurtenances, and improvements thereon and any and all surface and sub-surface rights, title, and interests, if any, and being more fully described as follows:

Lot 18, Hidden Ranch Subdivision, Unit 2, Wilson County, Texas, as shown on map or plat thereof recorded in Volume C, Page 285-287 of the Map and Plat Records of Wilson County, Texas.

V.
Property

- \$180,490.00, more or less, in United States Currency seized from [REDACTED]
[REDACTED]

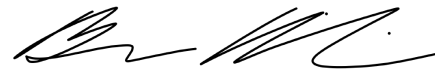
A TRUE BILL

[REDACTED]

FOREPERSON OF THE GRAND JURY

MARGARET F. LEACHMAN
ACTING UNITED STATES ATTORNEY

BY:



BRIAN NOWINSKI
Assistant United States Attorney